4000 Planning

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4100 Planning Section Organization

Refer to Section 4001 of the Region 9 Contingency Plan

4110 Planning Section Planning Cycle Guide

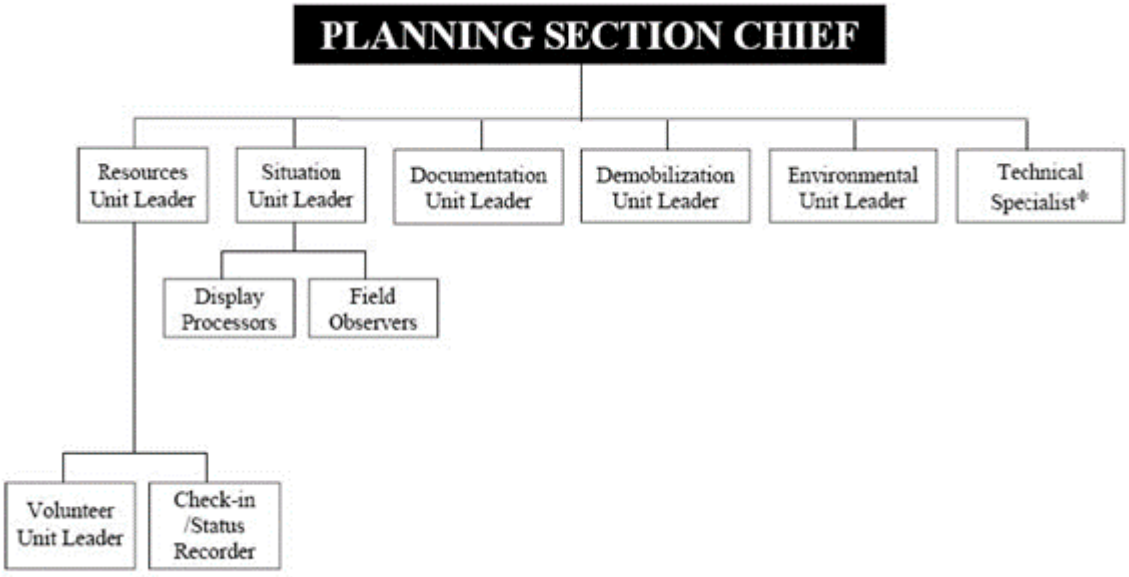
Refer to Section 4001.01 of the Region 9 Contingency Plan

4200 Situation

The Situation Unit Leader is responsible for the collection and evaluation of information about the current and possible future status of the spill and the spill response operations. This responsibility includes the compilation of information regarding the type and amount of oil spilled, the amount of oil recovered, the oil's current location and anticipated trajectory, and impacts on natural resources. This responsibility includes providing information to the GIS Specialist(s) for the creation of maps to depict the current and possible future situation and the preparation of reports for the Planning Section Chief.

Refer to Incident Management Handbook (IMH) for position responsibilities.

4210 Organizational Chart



4220 Weather/Tides/Currents

The Trajectory Analysis Specialist is responsible for providing to the Unified Command projections and estimates of the movement and behavior of the spill. The specialist will combine visual observations, remote sensing information, computer modeling as well as observed and predicted tidal, current and weather data to form these analyses. Additionally, the specialist is responsible for interfacing with local experts (weather service, academia, researchers, etc.) in formulating

these analyses. Trajectory maps, overflight maps, tides and current data, and weather forecasts will be supplied by the specialist to the Situation Unit for dissemination throughout the Command Post.

GIS Specialist is responsible for gathering and compiling updated spill information and providing various map products to the incident. The GIS team will work with the Situation Unit and the information management officer to ensure accurate and rapid dissemination of oil spill information to the ICS.

Resources at Risk Technical Specialist is responsible for the identification of resources thought to be at risk from exposure to the spilled oil through the analysis of known and anticipated oil movement and the location of natural, cultural, and economic resources. The Resources at Risk Technical Specialist considers the relative importance of the resources and the relative risk to develop a priority list for protection.

Refer to the Incident Management Handbook (IMH) for position responsibilities.

4230 Situation Unit Displays

The Display Processor is responsible for the display of incident status information obtained from Field Observers, resource status reports, aerial and ortho photographs and infrared data.

Field Observer is responsible to collect situation information from personal observations at the incident and provide this information to the Situation Unit Leader.

Refer to the Incident Management Handbook (IMH) for position responsibilities.

4240 On Scene Command and Control (OSC^2)

> **BACKGROUND -** The On-Scene Command and Control (OSC^2) system is the hub of GM's overarching Command, Control, Communication, Computers & Information (C4I) initiative. Although designed for oil and hazardous substance response, the system will be capable of being utilized any multi-agency, Incident Command System (ICS)-based response to a natural or man-made disaster.

OSC^2 will support and complement the Incident Command System, serving as the platform for the integration, display, and redistribution of real-time, or near real-time, response and planning information for use by the Unified Command and the Planning and Operations sections of the ICS.

The Coast Guard Standard Workstation III suite of software will be utilized to the maximum extent possible, with architecture that is compatible with commercial and government off-the-shelf applications and technology.

The Coast Guard Office of Response and the Research and Development Center, working jointly with the Army Corps of Engineers (ACOE), initiated the project in late 1995. Applied Science Associates Inc. is the prototype contractor. Although ACOE involvement ended in 1997, development continued and the prototype was delivered in February 1998. Members from the Strike Teams and the NSFCC have participated in the design and evaluation. Field testing of the prototype will take place at PREP exercise beginning in San Diego in April of 1998.

COMPONENTS - The initial prototype will include the following functions:

1 **Electronic ICS Forms** - A Microsoft Access relational database processes information among the 30-plus standardized forms used by the ICS. Response personnel will enter information once and it will automatically "map" to other forms that use the information. This will facilitate the creation of the Incident Action Plan, Situation Display and other reports.

2 **Situation Display** - Large-screen display will be generated with a Geographic Information System (GIS). This GIS will be capable of importing commercial-offthe-shelf nautical charts, digital maps, and other government or industry-produced geo-referenced data and contingency plan information. There will be graphical display and linkages to the ICS-managed resources. An oil spill trajectory model will be a key component of the Situation Display.

3 **Information Dissemination** – A web-based Intranet will be linked to the network in order to disseminate completed ICS forms and situational display information to all members of the Unified Command. This Intranet will have the capability to be accessed from outside the Command Post; either through controlled access for other unit, District or HQ use or, if desired, access via the Internet.

FUTURE CAPABILITIES - The subsequent phases of development will include increased ICS support, a wireless LAN, and enhanced situational display, along with the following features currently under consideration:

- real-time tracking/display of response resources using GPS transponders;
- real-time downlinking of still and video imagery from remote sites or overflights;
- real-time downlinking of images from sensors; e.g. hand held and forward-looking infrared, side-looking airborne radar (SLAR) and other sensors under development;
- tracking response resources and personnel using bar codes; and
- cost documentation and fund ceiling management with LUFS or CG SWIII equivalent.

The final repository for the production version of OSC^2 will most likely be the Incident Response and Planning module of the Marine Safety Network.

http://www.uscg.mil/hq/gm/mor/articles/osc2.htm

4250 Required Operational Reports

Federal Letters and Reports

Notice of Federal Interest (CG-5169)
Reference COMDTINST M16000.11, Coast Guard Marine Safety Manual, Volume VI, Chapter 7.B.3.a.

Notice of Federal Assumption
Reference COMDTINST M16000.11, Coast Guard Marine Safety Manual, Volume VI, Chapter 7.B.3.d.

Letter of Designation
Reference COMDTINST M16000.11, Coast Guard Marine Safety Manual, Volume VI, Chapter 7.

Situation/Pollution Reports Guidance (SITREP/POLREP)
Reference COMDTINST M16000.11, Coast Guard Marine Safety Manual, Volume VI, Chapter 7.B.6.b.(1).
The POLREP format can be found in Volume VII of the Marine Safety Manual, Figure 7-7.

4300 Resources

4310 Resource Management Procedures

Resource management involves the coordination and oversight of personnel, tools, processes, and systems that provide incident managers with timely and appropriate resources during an incident. Resource management involves four primary tasks:

- Establishing systems for describing, inventorying, requesting and tracking resources
- Activating those systems prior to, during, and after an incident
- Dispatching resources prior to, during, and after an incident
- Deactivating or recalling resources during or after an incident

Effective resource management includes planning for resource needs in advance of an incident, identifying how to locate and order resources based on the specific needs of the incident, categorizing the resources, developing interagency and public agreements for resources, and managing the resources as they arrive on-scene and at staging areas.

The Planning Section Chief may establish a Resources Unit Leader to maintain status on all resources assigned to the incident.

4310.1 Check-in Procedures

Check-in recorders are needed at each check-in location to ensure that all resources assigned to an incident are accounted for. The check-in recorders will report all arriving resources to the Planning Section's

Resources Unit Leader.

4320 Volunteers

The demands of an incident may exceed the resources of government organizations. Volunteers (both spontaneous and pre-trained) can support response efforts in many ways but the use of volunteers during an oil spill event is not automatic. The decision to employ volunteers will take into account the benefits that might be gained, against safety and liability realities. The UC, in the early stages of the event (see Section 4320.2), will make the decision whether volunteers will be employed and the capacities in which they can serve.

When the UC approves the use of volunteers, the UC will activate a Volunteer Unit in the Planning Section. During the preparation for the tactics meeting phase of the planning "P", the Resource Unit Leader, Planning Section Chief, and Operations Section Chief will determine the specific roles, site locations, safety requirements and required number of volunteers needed in the applicable operational period from the Volunteer Unit Leader (VUL).

If the Unified Command makes a decision to coordinate with Local Government in using Volunteers (other than oiled wildlife), Local Government representatives will be notified via the Liaison Officer or the VUL. Local Government will advise the Unified Command regarding their ability to assist in the requested Volunteer effort. If a particular local government cannot assist in volunteer coordination, the UC or VUL can request a neighboring city or county to facilitate volunteer coordination for the un-assisting local government. After participating local government partners have received, registered, and trained the requisite volunteers, that local agency will continue to coordinate with the VUL in the management of volunteers throughout the event. Volunteers shall only be deployed through direct written tasking from the UC during the tactics meeting via the IAP process. Volunteers will be treated with the same regard as other resources. The UC will supply logistical support to volunteers while operationally deployed (regardless of status condition), engage in logistical support, and continue said relationship with volunteers regarding any issue resulting from volunteerism during a spill.

4320.1 Volunteer Unit Leader (VUL)

The Volunteer Unit Leader is responsible for managing and overseeing all aspects of volunteer participation, including coordination with the local Emergency Volunteer Center (EVC). Volunteers will not report directly to the Command Post for registration and training, but will be registered, trained and deployed through the pre-identified local government partner (in most cases, a county Office of Emergency Services will activate their EVC for this purpose). The Volunteer Unit Leader (VUL) is part of the Planning Section and reports to the Resources Unit Leader. When practical the VUL should be an OSPR representative or designee. Other Volunteer Unit staff should be representatives from agencies within the affected jurisdictions, as available. Responsibilities include:

a. Review Common Responsibilities (section 2120).

b. Work w/ local government to activate local Emergency Volunteer Center (EVC) organizations and systems to receive, register and train convergent volunteers, as well as identify pools of pre-trained volunteers and coordinate trainers, training sites/opportunities.
c. Coordinate with Resource Unit to determine where volunteers are needed.
d. Coordinate with the JIC to advise the public of scheduled volunteer information sessions, where/how to register volunteer interest, whether volunteers are / are not needed; how volunteers might interfere with response workers and the limited roles of volunteers may perform if needed (i.e. potential health risks; cannot pick up oiled rocks or wildlife unless specially trained).
e. Identify any necessary skills and training needs (refer to position descriptions in Volunteer Plan).
f. Verify minimum additional training needed, as necessary, with Health and Safety Officer or units requesting volunteers (if special skill is required).
g. Activate, as necessary, standby contractors for various training needs (as applicable).
h. With the EVC, help coordinate training as part of the deployment process.
i. Coordinate with the EVC to identify and secure other equipment, materials and supplies as needed to support EVC operations.
j. Coordinate/communicate with the local government partner standing up the EVC, to help them induct spontaneous (on the scene) volunteers.
k. Activate other pre-identified and pre-trained volunteers
l. Recruit additional volunteers through media appeals (if needed).
m. Coordinate with the EVC to assure that volunteers are properly assessed, trained and assigned, and that on-going volunteer management needs are being met. .
n. Coordinate with Logistics for volunteer housing and meal accommodations.
o. Work with the EVC to assist volunteers with special needs.
p. Outreach to community volunteer organizations such as; faith-based, environmental groups, local humane societies, and government agency volunteer programs.
q. Maintain Unit/Activity Log (ICS Form 214).

A. STATE Volunteer Coordinator (SVC)
Office of Spill Prevention and Response
Volunteer Coordinator
1700 K Street, Suite 250
Sacramento, CA 94244-2090
Telephone: (916) 323-4731
Fax: (916) 324-8829

*B. AREA Volunteer Unit Leader (Area VUL) - Reserved

*C. LOCAL/Emergency Volunteer Center Volunteer Coordinator (EVC) - Reserved

4320.2 Shoreline Cleanup
Volunteers will not automatically be used for shoreline clean up. The benefit of volunteer efforts must be weighed against concerns for public safety.

Based on the conditions specific to that incident, the Unified Command will determine the suitability of employing volunteers for shoreline cleanup missions. When considering the use of volunteers on federally administered lands, the FOSC will consult with and gain the concurrence of the cognizant Federal Land Manager prior on the use of volunteers on Federal Lands.

In reviewing the potential use of volunteers in shoreline cleanup missions the UC will consider the following factors:

- Primary safety hazards (volume, exposure potential, size, type and toxicity of discharged oil)
- Secondary safety hazards (sneaker waves, tides, visibility, slips/falls)
- OSHA guidance
- Coast Guard safety manual
- Possible clean up locations
- Logistics and administrative support requirements (training, PPE, multi-jurisdictional coordination, public information
- Local government desire to manage volunteers (including recruiting, administering, training, deployment, recovery/decontamination)
- Weather/tidal conditions

4320.3 Volunteer Groups:

OSPR Volunteer page
http://www.dfg.ca.gov/ospr/about/msb/readiness/volunteer.html

Trained volunteer organizations:
Oiled Wildlife Care Network
http://www.vetmed.ucdavis.edu/owcn/participants.html

Gulf of the Farallones National Marine Sanctuary Beach Watch Volunteer Program:
http://www.farallones.org/volunteer/beach_watch_3.htm
beachwatch@farallones.org or 415.561.6625 x 302

4320.4 Volunteer Plan - Reserved
A state wide volunteer plan is being drafted by the RRT and will be included in the RCP.

4320.5 Volunteer Assignments - Reserved

Position descriptions for volunteers, and the staff that will be managing them, are being redrafted and will be included as part of the RCP Volunteer Plan.

4320.6 Required Training

Federal and State laws require employees (including volunteers) working on sites exposed to hazardous substances, health hazards, or safety hazards to receive training meeting State and Federal requirements before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards, and they shall receive or review training as specified in this paragraph.

Volunteer positions require varying degrees of training. While volunteers may have received training and certifications at previous spills, volunteers must have current certifications requisite to the desired volunteer position and may need to undergo new, or refresher training. Despite a volunteer's certification, site specific training shall be conducted before entry to the site is granted.

4320.7 Training Matrix – Reserved

The recommended skills and training required for each position description are being drafted, and will be included in the updated RCP Volunteer Plan.

4320.71 General Training Course Descriptions

Volunteers will be given appropriate training before being assigned. Training must be current. Any prior volunteer HAZWOPER training shall be renewed with new oil spill training sessions to satisfy a current oil spill volunteer response. This may cause delays in assignment if the volunteer has to be trained at the spill site, but it will avoid needless injuries. Volunteers must be trained to perform the tasks they are asked to do. An inexperienced and untrained volunteer will not be assigned to perform a task requiring training and/or experience.

1. 24-hour HAZWOPER Training - Is for volunteers identified prior to a spill who will back up the Oiled Wildlife Care Network (OWCN) capturing oiled birds and mammals. They would be in the hot or warm zone, within permissible exposure limits. OWCN has been given primary responsibility for capture and care of oiled wildlife; therefore, other volunteers will be called in only when the capacity of OWCN is exhausted.
2. 8-Hour annual HAZWOPER refresher training - required for volunteers who have had the 24-hour training. Office of Oil Spill Prevention and Response, will provide refresher training for a pre-determined number of volunteers who are identified as OWCN backup.
3. 4-Hour HAZWOPER - If the supply of 24-hour HAZWOPER trained volunteers is exhausted and more are needed to backup OWCN at an incident, a 4-hour on-scene HAZWOPER training will be given for those volunteers. Individuals trained at the 4-hour level may use this

training only once, at a single incident. If the individual finds that they may need to attend future spills, this person must secure training at the appropriate level.

4. 4-hour Hazard Communication (HazCom) Training - For volunteers who would be a backup in a rehabilitation facility. There is no refresher. The volunteer cannot be in the warm or hot zone. The 4-hour HazCom includes:

- Fundamentals of Toxicology
- Chemical/physical properties of petroleum products
- Physical Hazards (noise, thermal, lifting safety, slips, trips and falls, electrical safety.)
- Biological Hazards (zoonotic diseases, soil/water borne diseases, snakes, spiders and insects of concern).
- Personal protective equipment (boots, gloves, work suits, safety glasses, hearing protectors).
- Decontamination of personnel and equipment
- Reporting injuries (worker compensation forms, and deadlines)

5. 2-hour Workplace Health and Safety Training - will be conducted onsite for volunteers who will be working in the support zone (will not be in the warm or hot zone). For example, tasks could include clerical, phone, pre-beach cleanup, transportation of animals, etc. The 2-hour training includes:
Physical hazards (safe lifting; slips, trips and falls; general office ergonomics; general electrical safety.)
Chemical hazards (toner, disinfectants, rubber cement, etc.)
Safe driving
Rest breaks/replacement for exhausted workers
Reporting of injuries, worker compensation forms, and deadlines)

6. Site Safety Training - (approximately 5-20 minutes) to orient the volunteer of hazards at the site of the spill.

*HAZWOPER - Title 8, California Code of Regulations (CCR), Section 5192 (It is the same as 29 Code of Federal Regulations 1910.120.)

4400 Documentation

Thorough documentation is critical to post-incident analysis that may include internal/external investigations, Congressional inquiries, cost recovery enforcement, and/or criminal enforcement. The Documentation Unit Leader is responsible for the maintenance of accurate, up-to-date incident files.

Refer to Section 4004 of the Region 9 Contingency Plan

4410 Services Provided

Refer to Section 4004.01 of the Region 9 Contingency Plan

4420 Administrative File Organization

Refer to the Incident Management Handbook (IMH) for position responsibilities.

4500 Demobilization Guidelines

Refer to Section 4005 of the Region 9 Contingency Plan

4510 Sample Demob Plan

Refer to Appendix XXV of the Region 9 Contingency Plan

4600 Environmental (Sensitive Site Information)

Section 4600 provides a brief overview of environmental information; refer to Section 9800 for details including all of the Sensitive Site information. Section 9800 provides a geographically organized compilation of information about ecologic, cultural/historic, economic, and other significant resources which may be at risk from spills. Additionally, in Section 9800, some area committees provide pre-identification of Shoreline Operational Divisions and shoreline access information. There is also a glossary of local terms and acronyms which are in usage in some areas of California response.

The Environmental Unit Leader (ENVL) is responsible for environmental matters associated with the response, including strategic assessment, modeling, surveillance, and environmental monitoring and permitting. The ENVL prepares environmental data for the Situation Unit. Technical Specialists frequently assigned to the Environmental Unit may include the Scientific Support Coordinator and Sampling, Response Technologies, Trajectory Analysis, Weather Forecast, Resources at Risk, Shoreline Cleanup Assessment, Historical/ Cultural Resources, and Disposal Technical Specialists. The IMH ENVL Job Aid should be utilized.

The specific roles and responsibilities of the Resources at Risk (RAR) technical specialist will be address in future versions of the ACP. Refer to chapter 19, page 19-23 of the Incident Management Handbook (IMH) for additional RAR information.

4601 Protection Prioritization Using Trajectories

The Environmental Unit and the Environmental Unit Leader are responsible to provide environmental information, trajectory projections, and measures necessary to mitigate impacts. Foremost among these is to provide a prioritized list of protection strategies to protect resources at risk based on trajectory projections.

Protection prioritization in a spill event should be determined by two considerations. The driving consideration is **how soon the oil will reach the sensitive site. The second is the predefined protection priority associated with the site. This second consideration is applied only when there are insufficient response resources to protect all resources at risk before they are impacted by the oil.** Responders should not assume that sensitive locales equidistant from the source of a spill are at equal risk from the oil. This means that the urgency to protect a key resource is first determined by the likelihood that it will be impacted in the near future before it can be protected by requisite response staff and equipment (can the sites at risk be protected by available resources before oil arrives?) If the sites are too numerous to protect with the response

resources available within the projected times of impact, then triage of protection follows a prescribe order.

For the purpose of prioritization, "risk" is defined as "the probability of spilled oil reaching the vicinity of a sensitive site of concern." During an actual oil spill event, the relative likelihood of a site coming into contact with the oil is a function of the proximity of the spill to the site and whether prevailing conditions, the wind, current, and tides at the time of the spill, will move the oil toward or away from it. It is essential that a projected trajectory be developed to enable this assessment.

Trajectories, whether generated by computers or simple mathematical models, are estimates, and their predictions should be weighed carefully with the local conditions that actually determine oil movement and not assumed to be definitive. Trajectory projections used in Environmental Unit are usually generated from computer models while those used at the initial response are often “Back-of-the-envelope” or “envelope” pencil and paper calculations. Computer modeling is usually provided by or the through skilled oil spill modelers (see 4720.1). Envelope projections are invaluable at the outset of quickly evolving spills (as in estuaries) and can be developed even with incomplete information (regardless of visibility) by trained staff such as OSPR Scientific Field Staff, NOAA SSC, or other trained staff using the following recipe or some similar method.

1. Find the location where the oil first entered the water on a chart. (L1)
2. Find the tide and current predictions for the tide and current station nearest the location where the oil entered the water.
3. Identify the direction of current flow at the time the oil entered the water.
4. Find the time of the next slack current (T2) after the oil began entering the water (T1).
5. Find the time difference (Δ1) in hours between the time the oil began entering the water (T1) and the time of the next slack tide (T2).
6. Find the maximum tidal velocity in knots (V1) expected at the tide station closest to the spill source.
7. Multiply V1 times Δ1 to get the maximum distance (ΔL) the oil can be expected to travel from where it entered the water.
8. Using dividers or a straight edge and the scale on the chart, find the location that oil might be carried by the next slack water.
9. In ocean waters where wind is the dominant mover of oil, project wind movements at 3% of wind speed (wind in knts X 0.03) and map the vector.
10. Turn to the appropriate GRA map in Section 9800
11. Identify the environmentally sensitive sites and their response strategies within the predicted oil distribution at a given time (and if possible, the probable time of impact.)
12. List sites in the order in which the oil is expected to arrive (be sure to note site sensitivity so that A sites will receive priority attention if there are insufficient resources to protect all A sites.)
13. Identify which of the alternate protection strategies is needed for each site threatened in the prevailing conditions and the equipment and personnel required to implement each strategy.
14. Provide this information to the Operations Chief or the Tactics Meeting for implementation.
15. Identify shorelines that will need to be surveyed by reconnaissance or SCAT teams.
16. Coordinate with SCAT Lead to dispatch sufficient SCAT trained personnel and equipment necessary to survey all potentially impacted shorelines in two days.

Such approximations provide gross approximations of oil movement and do not include important phenomena including oil spreading and turbulence. As better information and capability is engaged, computer modeling combined with overflight images will improve initial envelope trajectories and replace steps 1 – 9 above. In any case, needed protection deployments should be identified and sequenced for protection based on probably timing of oil impacts, prioritization

priorities and available response resources. More information about initial envelope trajectory modeling and protection prioritization is available in Section 9800.2.

4602 Statutory Prioritization of Response

Both Federal and State laws establish three priority levels for dedication of emergency oil spill response resources:

First priority – protection of human health and safety
Second priority – protection of environmental resources
Third priority – protection of economic resources

The Environmental Unit Leader (ENVL) is responsible for environmental matters associated with the response, including strategic assessment, modeling, surveillance, and environmental monitoring and permitting. The ENVL prepares environmental data for the Situation Unit. Technical Specialists frequently assigned to the Environmental Unit may include the Scientific Support Coordinator and Sampling, Response Technologies, Trajectory Analysis, Weather Forecast, Resources at Risk, Shoreline Cleanup Assessment, Historical/ Cultural Resources, and Disposal Technical Specialists. The ENVL Job Aid should be utilized.

A listing of the ENVL's major responsibilities is located in Chapter 8 of the IMH.

4610 Environmentally Sensitive Sites

Refer to Section 9800 for the Environmentally Sensitive Site Summary Sheets, Strategy Sheets, and Response Diagrams for more detailed information.

The purpose of this section is to provide background, definitions, and philosophy behind the Site Summary and Strategy Sheets in ACP Section 9800. Both Federal and State laws require that sites having special ecological sensitivity be identified and provisions be made to protect or otherwise mitigate for the site impacts from spills. In California these locations are termed "Sensitive Sites". A narrative and diagram of each site with specific ecological and operational information has been developed.

The development of specific protection strategies to meet the site specific needs was conducted using a standardized protocol to ensure consistency for California's entire coast. The process of site visits, training exercises, and discussions allows trustees and response experts to exchange concerns and feasibility limitations in forming protection strategies. Using this approach, the local area committee incorporates input of State and Federal trustees, and stakeholders (industry, spill response co-ops and contractors, non-governmental environmental groups, and other agencies) to form consensus on the appropriate site protection strategies and response resources. The committee will revise strategies based on new knowledge and to adapt to changing conditions. This information is summarized in the Site Summary and Site Strategy pages in this section.

Section 9800 provides detailed information on Environmentally Sensitive Sites. Each site is described on multiple pages: Site Summary, Site Strategy, and Diagram. The Site Summary page provides a brief description of the site including location, access, specific natural resources concerns, ownerships and agency contacts, etc. The Site Strategy page provides specific information on response strategies to be implemented to protect the site from marine oil spills. The diagram page shows the protection strategies, topography and roads.

The resources at risk and particularly those which "drive" the sensitivity of the site are described on the Site Summary Page. The environmental sensitivity differs by location or season depending on conditions or the presence of species. These ranks define the environmental sensitivity of the area and its resources at risk. This ranking index should only be used for site protection priority when there are insufficient response resources to address all the environmentally sensitive sites at risk in the needed timeframes. Environmental ranking (A, B, or C) is based on the following definitions:

4610.1 Category A – Extremely Sensitive – Highest concern for protection

Wetlands, estuaries and lagoons with emergent vegetation (marsh-riparian ESI 10); sheltered tidal flat (ESI 9); and habitats for rare, threatened or endangered species (State or Federal); sites of significant concentrations of vulnerable and sensitive species (e.g. pinniped pupping).

4610.2 Category B – Very Sensitive – Very high concern for protection

Major pinniped haulout areas during non-pupping seasons; moderate concentrations of vulnerable and sensitive species; other low energy habitats (ESI types 8A, 8B, 7 and 6B)

4610.3 Category C – Sensitive. Great concern for protection

Higher energy habitats (ESI 6A through 1) for example: Habitats important to large numbers of species of sport, commercial value, and scientific interest or species experiencing significant population declines though not yet threatened.

In addition to the environmental narratives shown on the Site Summary page, a Site Strategy narrative provides information on protection strategies, recommended resources, and site logistical and access information. These Site Strategies are intended as guidelines to assist responders during the initial hours of a spill response. Most sites have more than one protection strategy. These additional strategies may be used as back-ups to the primary protection strategy or as alternatives to accommodate prevailing conditions. It should be understood that the described strategies are intended as initial protection strategies for the first 24 hours of a spill

The intent of the site strategies is to provide initial recommendations to protect the site until actual conditions and needs at sensitive sites can be determined to provide appropriately modified strategies. In other words, strategies presented here are flexible and may require modification in real response situations. The strategies provided are the best available response options for foreseeable typical wind and current conditions at the respective sites. Those conditions may not prevail at the time of the spill. Responders and planners may need to adjust strategies to meet the needs presented by prevailing conditions; following the initial emergency response many sites may have alternative strategies to accommodate differences in conditions. Additional or modified protection measures should also be considered.

4611 Fisheries – Seafood Tainting, Public Health Concerns, & Fisheries Closure

Fish and shellfish resources may be impacted in spill events. If these resources are impacted, there are several areas of concern each of which are addressed with different procedures and goals. They are public health concerns, seafood tainting, and fisheries closures. These three domains may intersect but they are not the same. For example fish or shellfish may have a flavor impact which could impact current and future market sales but not constitute a health hazard, and a commercial fishing closure may (or may not) be appropriate and may not (or may) merit a parallel sport fishing closure. RCP Appendix XXXII is the repository of available information on

seafood tainting and anticipated future developments: further procedures for fisheries impacts are under development subsequent to State statute enacted in 2008.

4620 Culturally Sensitive Sites

General Guidance for addressing Cultural / Historic sensitivities is found in Appendix XIX of the Regional Response Plan: CALIFORNIA IMPLEMENTATION GUIDELINES FOR FEDERAL ON-SCENE COORDINATORS FOR THE PROGRAMMATIC AGREEMENT ON PROTECTION OF HISTORIC PROPERTIES DURING EMERGENCY RESPONSE UNDER THE NATIONAL OIL AND HAZARDOUS SUBSTANCES POLLUTION CONTINGENCY PLAN provides the process to protect and conserve cultural and historic resources during a response.

Volume II/Section 9800 provides Area Committee and GRA specific Cultural/Historic information. Most cultural resource information is very confidential. Much of this detail is included in Cultural and Historic Resources Information System (CHRIS), an elaborate database maintained by the Office of Historic Preservation (SHPO) of the California Department of Parks and Recreation. Access to the database is restricted, and similar information is not publicly available here in order to keep these resources as secure as possible. In addition to the cultural /historic resource concerns noted on the Site Summary pages (when sensitive sites overlap cultural sites), Volume II/Section 9800 include details about accessing CHRIS, identify local stakeholders, and contacts and references to other information sources such as tribal databases or other similar sequestered sources.

4630 Economic Sensitive Sites

Strictly economic resources are designated as the third priority for dedication of oil spill response resources, following human health and safety and environmental resources. Refer to Volume II/Section 9800 for detailed tables and maps of economic sites in each county or Geographic Response Area. The tables and maps include geographic location of resource or facility, a brief description of the resource at risk, contact names and numbers, and the priority response ranking.

at risk, contact names and numbers, and the priority response ranking.

4640 Shoreline Operational Divisions

Most of the six California Area Committees have pre-identified “Shoreline Operational Divisions”. When these have been pre-identified, they are included in Volume II/Section 9800 along with other GRA information and shoreline operational division maps and descriptions area available. Shoreline Operational Divisions are numbered by county code and a single alpha character, e.g., LA-C for operational division C of LA County. This system is uniform throughout California. On-Water Operational Divisions or other special operational divisions may be identified by using a double alpha code such as AA or BB. Area Committees have pre-designated and pre-numbered shoreline operational divisions, because local geography, access, and historic spill responses dictate predictable patterns of shoreline response and cleanup. Refer to Volume II/Section 9800 for detailed information for each county or GRA.

4650 Shoreline Access Information

Some Area Committees have identified Shoreline access points which would be useful for response. Coastal access points are grouped and identified by the operational division where they occur. If this information is available, it may be found in Volume II/Section 9800 or through OSPR scientific and GIS staff for detailed coastal access information for each county or GRA.

Used in conjunction with Environmental Sensitive Sites and Operational Divisions, Shoreline Access information enables responders to be directed to the most convenient or appropriate coastal access point for their response effort. The amount of detail available for each access point is variable; northern California information is much less detailed than information included in southern California GRAs.

4700 Technical Support

Technical Specialists are advisors with special skills needed to support the incident. Technical Specialists may be assigned anywhere in the ICS organization. If necessary, Technical Specialists may be assigned to a separate unit. The Planning Section will maintain a list of available specialists and will assign them where needed. The following are example position descriptions for Technical Specialists that might be utilized during an oil spill response.

4710 Hazardous Materials

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), commonly referred to as the Superfund, was enacted on December 11, 1980. The purpose of CERCLA was to provide authorities the ability to respond to uncontrolled releases of hazardous substances from inactive hazardous waste sites that endanger public health and the environment. CERCLA established prohibitions

and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at such sites, and established a trust fund to provide for cleanup when no responsible party could be identified. In addition, CERCLA provided for the revision and republishing of the National Contingency Plan (NCP, 40 CFR Part 300) that provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also provides for the National Priorities List, a list of national priorities among releases or threatened releases throughout the United States for the purpose of taking remedial action.

CERCLA (pronounced SIR-KLA) provides a Federal Superfund to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through the Act, the Coast Guard and EPA were given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. Also, see HAZARDOUS MATERIALS at Section 7000 for further discussion.

4710.1 Toxicologist

Toxicology is the study of the adverse effects of chemical, physical, or biological agents on living organisms and the ecosystem, including the prevention and amelioration of such adverse effects.

The Sector San Francisco toxicologist is Dr. Ron Tjeerdema (Jeer-De-ma). His phone number is 530-754-5192.

4710.2 Product Specialist

A Product Specialist is an individual who works for a private enterprise and who is knowledgeable of the operating characteristics of specific materials that may harm the environment.

4710.3 Certified Marine Chemist

A Certified Marine Chemist (CMC) promotes the science of, and improve the methods of evaluation and eliminating health, fire and explosion hazards in marine and associated industries. The Sector San Francisco CMC is Henry Sorensen with the Pacific Chemical Labs group located in San Francisco. Their phone number is 415-864-1522.

4710.4 Certified Industrial Hygienist

An Industrial Hygienist (IH) is a professional evaluating the health effects of chemicals or noise in a work place. The IH use their knowledge to anticipate when a hazardous condition could occur to cause an adverse health effect on a worker or the environment. The Sector San Francisco IH is Bob Ford with OSPR. His phone number is 916-323-4686.

4710.5 Chemist or Chemical Engineer

Chemical engineers (CE) concern themselves with the chemical processes that turn raw materials into valuable products. CE skills encompass all aspects of design, testing, scale-up, operation, control, and optimization, and

require a detailed understanding of the various "unit operations", such as distillation, mixing, and biological processes, which make these conversions possible.

4720 Oil

The Federal Water Pollution Control Act (FWPCA) is the primary law used for response and enforcement of oil pollution and hazardous substance discharges on or upon the navigable waters of the United States, or tributaries there of.

The Clean Water Act (CWA) amended the FWPCA and made the following provisions:

Established pollution fund with a $100 million amount..
Defined “reportable and harmful quantities”.
Authorized the federal assumption of clean-up operations.
Established the National Response center.

The Oil Pollution Act (OPA) of 1990 streamlined and strengthened Coast Guard’s and EPA’s ability to prevent and respond to catastrophic oil spills. A trust fund financed by a tax on oil is available to clean up spills when the responsible party is incapable or unwilling to do so. The OPA requires oil storage facilities and vessels to submit to the Federal government plans detailing how they will respond to large discharges. EPA has published regulations for aboveground storage facilities; the Coast Guard has done so for oil tankers. The OPA also requires the development of Area Contingency Plans to prepare and plan for oil spill response on a regional scale. The Oil Pollution Act (OPA) of 1990 amended the CWA and made the following provisions:

Created a $1 billion pollution fund commonly referred to as the Oil Spill Liability Trust Fund (OSTLF).
Allowed On-Scene Coordinator (OSC) to issue administrative orders.
Increased civil penalties.
Increased spiller liabilities.

4720.1 Scientific Support Coordinator

The Scientific Support Coordinator (SSC), in accordance with the National Contingency Plan, will provide the federal On Scene Coordinator (OSC) scientific advice with regard to the best course of action during a spill response. The SSC will obtain consensus from the Federal Natural Resource Trustee Agencies and provide spill trajectory analysis data, information on the resources at risk, weather information, tidal and current information, etc. The SSC will be the point of contact for the Scientific Support Team from National Oceanic and Atmospheric Administration’s (NOAA) Hazardous Material Response and Assessment Division.

Refer to the Incident Management Handbook (IMH) for position responsibilities

4720.2 Lightering

In addition to local, commercial lightering companies, the National Strike Force and Navy SUPSALV own oil-pumping equipment. They recently added equipment capable of pumping highly viscous oils.

Refer to COTP Advisory 02-97 and section 3003.01.2(f1) Lightering for more information.

4720.3 Salvage

Salvage Engineering Response Team (SERT)

Provides immediate salvage engineering support to U.S. Coast Guard Units in response to vessel casualties. This includes independent technical evaluation of the situation and helping to formulate practical and effective solutions.

Description of SERT's Roles and Capabilities The Marine Safety Center SERT is comprised of 8-10 staff engineers who are on call **24 hours a day, 7 days a week** to provide immediate salvage engineering support to the Coast Guard Captains of the Port (COTP) and Federal On-Scene Coordinators (FOSC) in response to a variety of vessel casualties. Specifically, SERT can assist the COTP and FOSC manage and minimize the risk to people, the environment, and property when responding to vessels that have experienced a grounding, allision, collision, capsizing, or structural damage. SERT provides this assistance by performing numerous technical evaluations including: assessment and analysis of intact and damaged stability, hull stress and strength, grounding and freeing forces, prediction of oil/hazardous substance outlflow, and expertise on passenger vessel construction, fire protection, and safety. SERT has mobile computing capability for on-scene deployment. The MSC maintains a database containing over 5,000 hull files that can be used to generate computer models of vessels used in salvage engineering. External relationships with organizations like the Navy Supervisor of Salvage (SUPSALV), Coast Guard Intel Coordination Center, and the Office of Naval Intelligence (ONI), as well as all major class societies, also enable the salvage team to quickly locate and transfer information about a damaged vessel that would otherwise be difficult to access.

SERT also assists in the development and execution of exercises involving vessel casualties under the National Preparedness for Response Exercise Program (PREP). When requesting SERT assistance, the Rapid Salvage Survey Form, which contains the minimum essential casualty details, should be utilized.

In the event of a vessel casualty, initial contact with the vessel owner or representative is through the Captain of the Port (COTP) or Federal On-Scene Coordinator (FOSC). SERT may be contacted initially by the COTP or FOSC, and eventually the vessel representative or naval architect, using the following information:

- Marine Safety Center (0700 to 1630 daily): (202) 366-6480 or 6441

- Salvage Team duty member cell phone: (202)327-3985
- Salvage Team Leader: (202) 366-6441 or cell phone (202) 327-3987
- FLAGPLOT (manned 24 hours/7 days a week): (202) 267-2100 or 1-800-DADSAFE

Refer to section 9890.01 for more information on other sources of assistance and procedures.

4720.4 Shoreline Cleanup Assessment

The Shoreline Cleanup Assessment Technical Specialist or Coordinator serves in the Environmental Unit and reports to the Environmental Unit Leader. This function is responsible for providing appropriate cleanup recommendations as to the types of the various shorelines and the degree to which they have been impacted. The Shoreline Cleanup Assessment Technical Specialist or Coordinator should typically be staffed by a government regulatory natural resource trustee, environmental agency representative of California wildlife resources, or a contracted subject matter expert agreed upon by the Unified Command during the initial Unified Command meeting.

During a spill response shoreline assessment is a function that is commonly conducted under the Environmental Unit within the Planning Section. Figure 1 below highlights how the shoreline assessment function fits into a typical ICS structure. Depending on the complexity of the spill response, the Technical Specialist role may actually exist as a team. The teams are often made up of representatives from state and federal resource agencies, the responsible party and the USCG or USEPA and should be trained and knowledgeable in their roles. Members of the team can be:

1. Shoreline Assessment Coordinator and
2. Shoreline Assessment Team Leader or
3. Team member.

Bringing each of their agency's expertise together as a team Shoreline Assessment Teams collect the data needed to develop a shoreline cleanup plan that maximizes the recovery of oiled habitats and resources, while minimizing the risk of injury from cleanup efforts. Consideration should always be given to:

- Potential for human exposure, by direct contact or by eating contaminated seafood;
- Extent and duration of environmental impacts if the oil is not removed;
- Natural removal rates;
- Potential for remobilized oil to affect other sensitive resources; and
- Likelihood of cleanup to cause greater harm than the oil alone.

Information from these assessments must meet the requirements of the cleanup operation, being both timely and of uniform quality and content. Finally, the teams must coordinate their field activities with the operational

Divisions working in the areas being assessed. This ensures that all operations are conducted safely and that important information is exchanged.

The shoreline assessment data must be collected quickly since it is necessary for operational decision-making. Experience has shown that the dual objectives of NRDA and shoreline assessment are best met when field surveys for these activities are well coordinated. A typical ICS structure includes a NRDA Representative who works through the Liaison Officer at the Command Staff level. The NRDA representative is responsible for coordinating NRDA needs and the activities of the Natural Resource trustees.

The Shoreline Assessment Coordinator should be designated to manage the teams and synthesize their field data, utilizing standard GIS data formats compatible with CA OSPR's GIS database system, and develop reports used by the Environmental Unit and Planning Section to support the daily Incident Action Plan (IAP).

The shoreline assessment process should be easily modified to fit the spill conditions; it should be as simple as possible, yet comprehensive enough to address all of the issues and concerns of shoreline cleanup. It must not be a slow, cumbersome process that keeps Planning and Operations waiting for key data. When delays occur, Operations will be forced get the information it needs on its own, and thus the work products of the Shoreline Assessment Teams will not be used and critically impacted sites may be overlooked, missed, or placed at as a lower priority for response operations.

NOAA has a Shoreline Assessment Job Aid, which can aid the response organization in determining the extent of damage along various types of shoreline.
http://response.restoration.noaa.gov/shor_aid/shor_aid.html

Roles and Responsibilities of the Shoreline Cleanup Assessment Technical Specialist or Coordinator

- Coordinate Shoreline Assessment Team response activities
- Working within Operational and Unified Command Objectives, Strategies, and Tactics recommend the need for and number of SCATs.
- Conduct or assign someone to conduct aerial reconnaissance survey to scope the shoreline oiling issues
- Ensure that all teams have the necessary representation and all members have the necessary training
- Develop daily assignments for each team, according to the needs of the Planning and Operations sections to meet the Unified Command response objectives
- Coordinate with natural resource damage assessment (NRDA) concerns on shoreline assessment to optimize data sharing through the ENVL.

- Inform the ENVL of any cleanup concerns of the various resource agencies and managers and assist the ENVL with development of the IAP ensuring those concerns are addressed in the decision-making process
- Arrange for equipment and transportation for the Shoreline Assessment Teams through the Logistics Section
- Coordinate actions with Operational Branches, Groups, and Divisions.
- Assist in the development of cleanup guidelines
- Assist in the development of recommendations for cleanup endpoints considering shoreline type, ecological sensitivity, recreational use, and aesthetic requirements, etc.
- Assist in the development of cleanup guidelines for implementation based on each cleanup method for the impacted shoreline types, including any agency concerns
- Lead SCAT reporting requirements to the ENVL, PSC and Unified Command
- Develop a survey and reporting schedule to produce survey results in time for incorporation into the Incident Action Plan (IAP)
- Ensure that teams use proper terminology and apply guidelines uniformly
- Receive reports from field teams and synthesizes them into a daily summary in IAP format that is accessible to the field teams if problems arise
- Brief ENVL on issues raised by the Shoreline Assessment Teams, particularly where cleanup methods must be modified to increase effectiveness or decrease impacts
- Helps team reach consensus and report dissenting opinions when consensus is not reached to the ENVL.
- Continue to lead evaluation of targeted cleanup endpoints and modifies them as necessary
- Maintain Unit Log (ICS 214-CG).

Responsibilities of the Shoreline Assessment Team

- Describe shoreline types, oiling conditions, and physical setting
- Identify sensitive resources (ecological, recreational, cultural)
- Determine the need for cleanup
- Recommend shoreline cleanup methods and endpoints:
- Specify generic and site-specific constraints for cleanup activities
- Determine the need for follow-up surveys if archaeological and cultural resources are present
- Establish cleanup priorities
- Identify safety concerns for cleanup operations
- Monitor cleanup effectiveness and effects, suggesting changes where needed
- Determine when cleanup operations are no longer effective
- Conduct post-cleanup inspections before sign-off

- Recommend to Shoreline Cleanup Assessment Technical Specialist or Coordinator if cleanup necessary at a given location based on observations
- Assist in the determination of which cleanup methods are appropriate or recommended for a given location
- Assist in the determination of which constraints are needed to protect sensitive resources for a given location
- Assist in the determination of site prioritization
- Assist in the determination if cleanup operations are being conducted properly
- Assist in the determination if the cleanup method being used is no longer effective or causing collateral damage and recommend alternative methods.
- Assist in the determination if the targeted endpoints are realistic and obtainable for the current spill conditions.
- Assist in the determination if cleanup operations should be terminated at a given site

4720.5 Natural Resource Damage Assessment

Refer to section 9720.2 for procedures for conducting a Natural Resource Damage Assessment.

4720.6 Specialized Monitoring of Applied Response Technologies (SMART)

SMART is used to scientifically monitor the use of dispersants, other chemical countermeasures, or in-situ burns. These operations however, because of their time sensitivity shall not be delayed pending the arrival of SMART monitoring equipment or personnel.

SMART is used to collect scientific information for the Unified Command to provide a measurement of success in the operation and to improve the knowledge about non-mechanical recovery procedures.

Documents for SMART can be found at:
http://www.uscg.mil/hq/nsfweb/NSF/onlinedoc2.html

4720.7 Response Technologies (Dispersant, ISB, Bioremediation, Mechanical)

The Alternative Response Technologies Specialist is responsible for evaluating the opportunities to use ART, including dispersant or other chemical countermeasures, in-situ burning, and bioremediation. The specialist will conduct the consultation and planning required to deploy a specific ART, and articulate the environmental tradeoffs of using or not using a specific ART.

Refer to the Incident Management Handbook (IMH) for position responsibilities

4720.8 Decontamination

The decontamination group is responsible for decontamination of personnel and response equipment in compliance with approved statutes. Contaminated personnel and personnel entering contaminated areas shall be decontaminated in accordance with the instructions of the Site Safety Officer (SSO). The following "minimum" actions shall be performed:

- Direct and coordinate decontamination activities
- Determine resource needs
- Brief SSO on conditions

Sample Decontamination Plan

The decontamination group is responsible for developing the decontamination plan for the response. Refer to form G of the Site Safety Plan for decontamination equipment and procedures template.

4720.9 Disposal

Refer to APPENDIX XXVII of the Region IX Contingency Plan for a Waste Management Plan example.

4720.10 Dredging

TBD

4720.11 Deepwater Removal

TBD

4720.12 Heavy Lift

TBD

4730 General

4730.1 Cultural and Historic Properties

Information on cultural and historic properties is protected and can only be obtained on a case-by-case basis. Refer to Section 1680 of this Plan for the State Historic Preservation Office contact information. The RCP guidelines (RCP Appdx XiX) require that in so far as possible, a FOSC Historic Properties Specialist will be identified and assigned to Environmental Unit to ensure that the Guidelines are properly implemented. USCG has several vendors with BOAs to supply staff for this function.

4740 Law Enforcement

The Law Enforcement Group is responsible for coordinating and directing all law enforcement activities related to the incident, including but not limited to, isolating the incident, crowd control, traffic control, evacuations, beach closures, and/or perimeter security.

Perimeter/Crowd/Traffic/Beach Control

Perimeter/Crowd/Traffic/Beach Control if needed should be coordinated with local law enforcement authorities and may be augmented or replaced with contract security for protracted responses.

Safety/Security Zones

Safety Zone regulations in 33 CFR 165.20 Subpart C is defined as a water area, shore area, or water and shore area to which, for safety or environmental purposes, access is limited to authorized persons, vehicles, or vessels. It may be stationary and described by fixed limits or it may be described as a zone around a vessel in motion.

Security Zone regulations in 33 CFR 165.30 Subpart D is defined as an area of land, water, land and water which is so designated by the Captain of the Port or District Commander for such time as is necessary to prevent damage or injury to any vessel or waterfront facility, to safeguard ports, harbors, territories, or waters of the United States or to secure the observance of the rights and obligations of the United States. The purpose of the security zone is to safeguard from destruction, loss, or injury from sabotage or other subversive acts, accidents, or other causes of similar nature: (1) vessels (2) harbors (3) ports, and (4) waterfront facilities: in the United States and all territory and water, continental or insular, that is subject to the jurisdiction of the United States.

4750 SAR

The Search and Rescue group is responsible for prioritization and coordination of all Search and Rescue missions directly related to a specific incident. All search and rescue operations will be coordinated through the Sector San Francisco Operations Center.

4760 Marine Fire

Refer to Coast Guard Sector San Francisco Marine Fire Fighting Contingency Plan. This document is published as a standalone document under a separate cover.

4770 Potential Places of Safe Refuge (PPOR) Unit

The ultimate authority and responsibility for making a PPOR decision rests with the COTP. Thus, the Salvage Operations Leader of the PPOR unit should be a senior USCG officer who can coordinate the efforts of salvors, implement the COTP salvage objectives, directives, concerns, review and comment on the salvage plan, and provide direct coordination between the COTP, Salvage Master, Operations Section Chief, and other IMT positions and the Branch functions. Ideally this officer should have strong familiarity with Salvage, local port issues, and Potential Places of Safe Refuge (PPOR) assessment tools and preplanning. There are also significant Public Information issues which may require skillful management. This PPOR Unit Leader shall have direct contact with the COTP and shall keep the Ops

and Planning Chiefs informed of concerns and progress and be available for stakeholder organization and media/public interviews and addresses.

4770.1 Potential Places of Safe Refuge (PPOR)

The PPOR Unit should recognize that not all vessels which are damaged and seeking harbor are “Potential Places of Safe Refuge” incidents requiring PPOR treatment. Usually PPOR incidents are engaged when there is a flagrant probability of an environmental, economic, or public health impact or an escalation is likely due to ship loss or other egregious impact.

When PPOR situations arise, guidance for assessing and selecting an appropriate place of safe refuge is provided in RCP Appendix XXVI Guidelines for Potential Places of Refuge Decision-Making. Guidance directs the COTP to make appropriate determinations and provides for decision and consultations with stakeholders under different time constraint scenarios. It also directs pre-planning and assessment of potential places of refuge. The remainder of this section deals with the facets of PPOR identification, rating, and selection.

4770.2 PPOR Pre-Incident Planning

The PPOR Unit should be aware that the three Area Committees in Sector San Francisco’s Area of Responsibility have conducted PPOR planning. These assessments conform to the uniform assessment protocol established for the State of California with assessments on standard information categories. In addition to the information in the Chapter 8, Sector SF also maintains a database of potential sites where any updates may be captured and from which these pages are printed. The background and process of this pre-incident survey is also detailed there. The information collected is intended to be comprehensive and also has been tailored so that it may easily be used to assist in the use of the Place of Refuge Risk Assessment Job Aid.

4770.3 PPOR Unit Guidance Regarding Decision Process and Players

Both the NRT and RRT guidance indicate that Places of Refuge decisions are contextualized in the need for expediency. While it is desirable to inform and include the wide array of stakeholders in the decision process so that situation related information may be front-loaded and stakeholder concerns can be identified and addressed, time may not permit such an engagement, particularly, as is the case of most California ports, there are a large number of stakeholders.

Minimally, the COTP and the responsible party’s salvage representatives will be included. An additional key player is the State On-Scene Coordinator who will provide liaison with the Governors Office and local agencies. A State or Federal Resources at Risk Technical Specialist who is familiar with local resources and skilled at difficult environmental trade-off decisions is a

valuable asset both in communicating with other resource trustees and in making informed decisions. In instances requiring a quick-term decision, these may be the only participants. Ultimate decision authority resides with the COTP.

When circumstances permit and there is more time for advance planning for the vessel arrival, a more comprehensive assessment can be made by forming a PPOR Unit within the Planning Section. The team will include a salvage team representative, a lead Natural Resources Trustee, and a local government agency leader. These latter two sub-leads are responsible to engage the wider scope of stakeholders which have been identified in the RRT and NRT guidance documents. The listed contacts are a far-ranging list, and contacting all of them may not be feasible in many circumstances.

What is clear from drills and exercises executed in California is that a clear sequence of issues tends to engage distinct sets of stakeholders in a distinct sequence. Based on these lessons learned the PPOR Unit can expect the following sequence of engagement and decision processes.

The PPOR Unit first works with salvors to determine where they would prefer the vessel be located to effect necessary salvage operations. Their choices and preferences may be constrained as indicated in section 3321.3.1. The PPOR Unit Leader is to ensure the PPOR list includes all potential places which can serve the exigent needs, and not just the preferred locales of convenience. Once an initial PPOR list has been created, the PPOR Unit must then determine the possible scenarios and consequences to evaluate human health and safety risks, natural resources at risk, and economic interests. Each scenario should be written down so that details and critical decision points are captured throughout the evolution and can be articulated later.

As soon as a PPOR list has been developed, the natural resource concerns may be used to help evaluate relative desirability. This portion of the process should be under the guidance of a lead Natural Resource Trustee. The lead Natural Resources Trustee (LNRT) should be familiar with local resources and skilled at difficult environmental trade-off decisions. The LNRT should identify and reach-out to respective natural resource trustees whose trustee resources might be at risk. It is the LNRT's job to explain the situation, limit the discussion to the identified list of potential locations, establish a working scenario to use for the decision process, and help trustees evaluate consequences and make trade-off decisions. This role is key as many trustees are neither experienced nor comfortable making adverse environmental trade-off decisions based on incomplete information. It is important that the scenario derived by the salvage participant is used help make the decision

Once alternatives have been narrowed by the PPOR Unit and Natural Resource Trustees, the local agencies should be engaged by the local agency lead. It is clear from the 2007 Cosco Busan event that there is a large information gap between the technical side of oil spill realities and public perception which is easily exacerbated by media getting in advance of

event public information releases. Therefore, it is important that the local agency representatives be engaged synchronously with a basic information package to limit speculation and focus discussion on available options (more detail in section 3323.)

The lead local agency representative will make a similar assessment for public health concerns using inputs from public health agencies and for economic concerns using local government agencies.

4770.4 PPOR Unit Decision Tools

There are two approaches to the decision process. Both include the activities described in the previous section. One is a committee-like process which has been used successfully in events and drills in Alaska (Alaska Model) and the other is an analytic approach which has been used in a real event in Hawaii and 2008 NPREP drills in California. Experience to indicate that the place of safe refuge chosen is the same whether intuitively justified or quantitatively derived. Both approaches work because there are clearly reasonable considerations which make some alternatives more preferable and others more problematic. Neither system is immune to political or hysterical public response.

4770.4.1 Alaska Model

In the Alaska Model, the salvors and Natural Resource Trustees collaborate to simultaneously evaluate options as indicated in 3322.2 above, and as they arrive at the least adverse alternative (best available choice), they confer and work out differences or mitigation concerns to arrive at a single preferred alternative. Having done so, the PPOR Unit calls the stakeholders in an open conference call where each stakeholder identifies their concerns in five minutes or less and provides their preference. This forum allow for immediate address and, at times, alleviation of concerns by including mitigating measures. This works well when the universe of stakeholders is reasonably tractable.

4770.4.2 Place of Refuge Risk Assessment Job Aid

The Place of Refuge Risk Assessment Job Aid was recommended (but not obligatory) under COMMANDANT INSTRUCTION 16451.9. This instruction provided process guidance and an analytic tool to make assessment of alternative responses to ships seeking safe refuge. The analytic tool is a spreadsheet which helps to convert qualitative appraisals into quantitative comparisons. The tools and guidance are available in the RCP Appendix XXVI. The tool is particularly helpful for those who struggle with making environmental decisions with suboptimal information between undesirable alternatives to seek the most preferred choice.

As explained in the accompanying documents, the tool is risk based decision aid which uses a risk base matrix: where Risk = Probability event getting worse by a course of action X consequences resulting.

Relying on subject matter experts and stakeholders to do evaluation: This tool is effective. It should be engaged by a person who has been trained in its use (PPOR Unit Leader and, hopefully, respective Trustee and local agency leads). The tool can be used to treat many options simultaneously and show comparative desirability.

(If this tool is used, the potential to contain a spill at a particular place of refuge candidate site should be included in Natural Resources Page as "Other" with a weight of 5 and the scale below.) 2 high containment - little or no loss 4 mostly contained - some escapement likely with local impacts 8 good containment - mostly contained, mostly confinable and skimmable locally partial containment - continuous escapement, likely to expand throughout local 16 area despite skimming 32 containment unlikely - wide ranging slick with no control likely

4770.5 PPOR Unit Activities to Address Public Relations and Special Concerns for Places of Safe Refuge

It is very clear that distressed vessels coming into a port is a newsworthy item. COTP is the sole person having responsibility for this decision. Managing information about such an event is essential to the success of the event, particularly in portions of California where public awareness of the consequences of inaction are poorly developed.

COTP may call upon PIO efforts above and beyond normal media events when a PPOR event is occurring. It is important to form a public information plan simultaneously with the formation of a PPOR Unit. It is likely that before a formal recommendation is made to the COTP by the PPOR Unit that a plan to share the information and further the decision with key stakeholders is in place and materials are ready for distribution.

In addition to informing the USCG Command, the RRT should be advised of preliminary options and likely final candidate and their support sought. Immediately after, the local stakeholders must be engage to address public health and economic concerns. This may best be done by making a fact sheet with final candidate site(s) identified and rational/constraining issues which limit choices to included candidates. The local agencies must be included in the completion of the assessment and should be provided with the remaining portions of the decision process or tool and a preplanned conference call as well as points of contact. This information may best be distributed through State OES emergency contact system. This outreach must not only include the local agencies where candidate site(s) may be located, but all those agencies in route as well.

4771 PPOR Decision Making Job Aid

Refer to Appendix XXVI of the Region 9 Region Contingency Plan.

4780 Planning Considerations for Nonfloating Oils

Refer to Appendix XXVIII of the Region 9 Region Contingency Plan.

4800 Required Correspondence, Permits & Consultation

Refer to Section 4003 of the Region 9 Region Contingency Plan

4810 Administrative Orders

Refer to Section 4003.01 of the Region 9 Region Contingency Plan

4820 Notice of Federal Interest

Refer to Section 4003.02 of the Region 9 Region Contingency Plan

4830 Notice of Federal Assumption

Refer to Section 4003.03 of the Region 9 Region Contingency Plan

4840 Letter of Designation

Refer to Section 4003.04 of the Region 9 Region Contingency Plan

4850 Fish and Wildlife Permits

Refer to Section 4003.05 of the Region 9 Region Contingency Plan

4860 ESA Consultations

Refer to Section 4003.09 of the Region 9 Region Contingency Plan

4870 Disposal

Refer to Section 4003.06 of the Region 9 Region Contingency Plan

4880 Dredging

Refer to Section 4003.07 of the Region 9 Region Contingency Plan

4890 Decanting

Refer to Section 4003.08 of the Region 9 Region Contingency Plan and Decanting MOU with State Water Resources Control Board in Appendix VIII of the Region 9 RCP.

4900 –Reserved

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